

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

OCT 16 2016
David J. Driscoll, ClerkUNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

Miguel Angel Garcia

YOB: 1968

Principal

United States

Case Number:

M-16-1915-M

Liza Marie Morales

YOB: 1980

Co-Principal

United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 10/14/2016 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Fabian Suarez-Gomez, citizen and national of the United Mexican States, and Alma Delia Perez-Vaca, citizen and national of the United Mexican States, for a total of two (2), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in Roma, Texas to the point of arrest in Roma, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On October 14, 2016, Border Patrol Agents Gonzalez and Dubois were patrolling the area of Roma, Texas in an unmarked vehicle. The Aerostat located in Roma, Texas, observed two subjects cross the Rio Grande River illegally and walk north towards a neighborhood. The Aerostat operator relayed the information to agents working the area. Agents Gonzalez and Dubois responded and positioned themselves north of the area. Agents noticed two subjects wearing dark clothing exit the nearby brush and run towards a red Chevrolet pick-up truck. Agents witnessed the two subjects enter the pick-up truck and lay down in the back passenger seat area. Agents followed the red truck and relayed the information to other agents and Department of Public Safety Troopers nearby.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Jul C Peña

Signature of Complainant

Julio C. Peña Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

October 16, 2016

Date

4:02 pm

at McAllen, Texas

City and State

Peter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16-1915-M

**RE: Miguel Angel Garcia
Liza Marie Morales**

CONTINUATION:

Trooper Wallek responded and was able to locate the red pick-up truck. Trooper Wallek conducted a traffic stop on the red pick-up truck for following too close to another vehicle and due to the information relayed over the service radio regarding the possible alien smuggling activity. As agents and trooper Wallek approached the pick-up truck, they noticed two subjects laying on the back passenger floorboard. Agents questioned all the occupants as to their immigration status. The driver identified himself as Miguel Angel Garcia-Ramirez, a United States citizen. The front passenger identified herself as Liza Marie Morales, a United States citizen. The other two passengers admitted to being illegally present in the United States. All subjects were placed under arrest and transported to the Rio Grande City Border Patrol Station.

PRINCIPAL STATEMENT – 1:

Miguel Angel GARCIA-Ramirez, a United States citizen, was read his Miranda Rights and agreed to provide a sworn statement without the presence of an attorney.

GARCIA stated he was hired to transport illegal aliens from Roma, Texas to an unknown location. GARCIA also stated he was to receive \$200 USD per illegal alien as compensation. GARCIA indicated that his friend Liza Marie MORALES was also going to receive an unknown amount of money for her participation. GARCIA claims that MORALES knew they were going to pick up illegal aliens and agreed to participate in the smuggling event.

PRINCIPAL STATEMENT – 2:

Liza Marie MORALES, a United States citizen, was read her Miranda Rights and declined to provide a sworn statement without the presence of an attorney.

MATERIAL WITNESS STATEMENT – 1:

Fabian SUAREZ-Gomez, a citizen of Mexico, was read his Miranda Rights and agreed to provide a sworn statement without the presence of an attorney.

SUAREZ stated that he paid \$1,100 USD to be smuggled into the United States. SUAREZ also stated that once in the United States, the smuggler instructed him to run north and that there was going to be a red pick-up truck waiting for him. SUAREZ claims he did as instructed and when he approached the red pick-up truck, the driver told him to get in and hunker down. SUAREZ also indicated that he noticed a female sitting in the front passenger seat.

Fabian SUAREZ-Gomez identified Miguel Angel GARCIA-Ramirez through a photo lineup as the driver of the red pickup truck.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16-1915-M

**RE: Miguel Angel Garcia
Liza Marie Morales**

CONTINUATION:

MATERIAL WITNESS STATEMENT – 2:

Alma Delia PEREZ-Vaca, a citizen of Mexico, was read her Miranda Rights and agreed to provide a sworn statement without the presence of an attorney.

PEREZ stated that she paid \$1,100 USD to be smuggled into the United States. PEREZ also stated that once in the United States, the smuggler told her and her husband that a red pick-up truck was going to pick them up. PEREZ claims that they ran towards the red truck waiting for them. PEREZ also indicated that when they approached the red truck, the passenger door opened and the driver told them to get in and hunker down. PEREZ stated that she noticed a female sitting in the front passenger seat.

Alma Delia PEREZ-Vaca identified Miguel Angel GARCIA-Ramirez through a photo lineup as the driver of the red pick-up truck.

Alma Delia PEREZ-Vaca identified Liza Marie MORALES as the female sitting in the front passenger seat.